

FILED 18 OCT 4 1056USDC-ORM

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

UNITED STATES OF AMERICA

1:18-cr- 00464-AA

v.

INDICTMENT

WILLIAM GREGORY DOUGLAS,

18 U.S.C. § 2261A(2)(B)

Defendant.

THE GRAND JURY CHARGES:

COUNT 1
(Cyberstalking)
(18 U.S.C. § 2261A(2)(B))

During August and September 2018, in the District of Oregon, and elsewhere, Defendant WILLIAM GREGORY DOUGLAS, with the intent to kill, injure, harass and intimidate another person, used interactive computer services and electronic communication services and electronic communication systems of interstate commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to-wit: DOUGLAS sent messages by way of Twitter, Inc. ("tweets") to YouTube LLC expressing his anger and frustration with persons at YouTube and threatening to commit a mass shooting of its employees in California and to come after its Chief Executive Officer for removing his YouTube channel;

In violation of Title 18, United States Code, Section 2261A(2)(B).

Indictment

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Revised April 2018

Dated this 4 day of October 2018.

A TRUE BILL.

Presented by:

BILLY J. WILLIAMS
United States Attorney

Byron Chatfield
BYRON CHATFIELD, OSB #730599
Assistant United States Attorney

/s/ Grand Jury Foreperson